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Attorneys for Plaintiffs and proposed collective action and class action members

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

VIRGINIA ALEYN, DOMINIQUE BELL, KRIS MOUNT, SUKOL PHAIROJ, KATHERINE TUMINELLI and CRAIG YOCHEM on behalf of themselves and all other similarly situated,

Plaintiffs,

-against-

JEAN-GEORGES ENTERPRISES, LLC d/b/a V STEAKHOUSE; JEAN-GEORGES MANAGEMENT LLC d/b/a V STEAKHOUSE; JEAN-GEORGES VONGERICHTEN and PHIL SUAREZ

Defendants.

Civil Action No.: 07-6276 (HB) (DCF)

NOTICE OF PROPOSED SETTLEMENT OF CLASS **ACTION LAWSUIT, CERTIFICATION OF FLSA** COLLECTIVE ACTION, **CERTIFICATION OF STATE** LAW CLASSES, AND SETTLEMENT HEARING

PLEASE TAKE NOTICE that upon the accompanying Joint Stipulation of Settlement and Release and all agreements attached thereto, the undersigned will and hereby do move this Court before the Honorable Harold Baer, United States District Court, Southern District of New York, 500 Pearl Street, New York, NY 10007, on a date

to be determined by the Court or as soon thereafter as counsel may be heard for an order preliminarily approving the class action settlement agreement and notice to the class.

Dated: April 17, 2008 New York, New York

JOSEPH & HERZFELD LLP

/s/ D. Maimon Kirschenbaum

By: D. Maimon Kirschenbaum (DK-2338) Charles E. Joseph (CJ-9442)

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